

## **REMARKS**

Applicants appreciate the Office Action of August 2, 2004. Applicants have amended to the specification as set out above to address the Examiner's objections to the specification and abstract. Applicants respectfully request that the objections with respect to the specification and abstract be withdrawn. Applicants have also amended Claims 10, 42 and 65 to remedy an issue with antecedent basis. Applicants respectfully request that the objections with respect to these claims be withdrawn. Applicants have canceled Claims 2, 24-32, 34 and 57 from the present application. Applicants have also amended Independent Claims 1, 33 and 56 as set out above and submit that the amended independent claims are patentable over the cited references for at least the reasons discussed herein. Accordingly, Applicants submit that the pending claims are in condition for allowance for at least the reasons discussed herein.

### **The Specification has Been Amended**

In response to the objection to the specification in the Office Action (*See* Office Action, page 2, paragraph 2), Applicants have amended the "Related Applications" section to provide the corresponding issued U.S. patent numbers and serial number where available. Furthermore, Applicants have also amended the specification at page 8 to include U.S. Patent No. 6,772, 331.

Applicants have also amended the abstract of the disclosure as set out above. Accordingly, Applicants submit that the objections set out in the Office Action at page 2, paragraph 2.2 have been obviated.

Responsive to the objections in the Office Action at page 3, paragraph 2.3, with regard to the specification at page 4, line 16 and page 29, line 7, the hyperlinks has been changed by removing "http:\\\" from the hyperlinks, so that there no longer are executable hyperlinks in the specification. Moreover, responsive to the objection at page 3, paragraph 2.4 in the Office Action, the specification has been reviewed and amended for proper usage of trademarks as appropriate.

Accordingly, Applicants respectfully submit that the specification is accurate and complete and, therefore, request withdrawal of the objections to the specification set out in the Office Action.

### **Claim Amendments**

Many of the method claims have been amended to eliminate recitations of "step" and many of the computer program product claims have been amended to eliminate "means" language. Furthermore, applicant has amended many of the claims to remove the recitations of "securely operably connecting" and replace them with "establishing a secure, operable connection".

### **Claim Objections**

Claims 10, 42 and 65 stand objected to due to a lack of antecedent basis. Applicants have amended these claims to correct the issue with antecedent basis. Accordingly, Applicants submit that the objections with respect to these claims has been obviated.

### **Amended Independent Claims 1, 33 and 56 are Patentable over the Cited references**

Claims 1-4, 6-7, 10, 13-14, 16-17, 19, 33-36, 38, 39, 42, 45-46, 48-49, 51, 56-59, 61-62, 65, 68-69, 71-72 and 74 stand rejection under 35 U.S.C. §102(e) as being anticipated by United States Patent No. 6,125,192 to Bjorn *et al.* Applicants respectfully disagree as many of the recitations of these claims are neither disclosed nor suggested by the cited references. For example, Amended Independent Claim 1 recites:

- A system for securely providing biometric input from a user, comprising:
  - a security component which provides security functions, such that the security component can vouch for authenticity of one or more other components with which it the security component is securely operably connected;
  - a biometric sensor component that is securely operably connected, as one of the one or more other components, to the security component;
  - a card containing stored secrets and stored identifying information pertaining to an authorized holder of the card;
  - a card reader for repeatedly accessing the stored secrets and stored identifying information, wherein the stored identifying information comprises stored biometric information of the authorized holder and wherein the card reader is configured to repeatedly access the stored secrets and stored identifying information upon beginning a security-sensitive operation and is configured to terminate repeatedly accessing upon completion of the security-sensitive operation;
  - means for operably inserting the card into the card reader;
  - means for establishing a secure, operable connection between the biometric sensor, the card reader, and the security component;

means for comparing the repeatedly obtained biometric information to the stored biometric information of the authorized holder of the card; and

**means for concluding, within the security component, that the security-sensitive operation is authentic based on all the one or more other components which are securely operably connected to the security component remaining securely operably connected to the security component until completion of the security-sensitive operation.**

Amended Independent Claims 33 and 56 contain corresponding computer program product and method recitations, respectively. Applicants respectfully submit that at least the highlighted portion of Claim 1 is neither disclosed nor suggested by the cited reference for at least the reasons discussed herein.

As recited in Claim 1, the system includes a security component that provides security functions that can vouch for authenticity of components with which it is securely operably connected. Biometric input of a user is obtained from a biometric sensor component and stored on a card. Within a security component, the security-sensitive operation is determined to be authentic so long as the other components (the components other than the biometric sensor that are to be authenticated) remain securely operably connected to the security component during the security-sensitive operation.

The specification of the present application describes the security core (security component), and authentication of components attached thereto, in accordance with some embodiments of the present invention, as follows:

In the preferred embodiments, components that authenticate themselves to the security core must remain physically attached thereto throughout an application function. Application-specific processing may be provided within each application processing subsystem to handle detachment of a component. For example, if camera module 130 is unplugged from the security core in the middle of taking a photo, the camera would have no way to transmit the photo (since it is preferably dependent on the security core for power, I/O, image storing, and so forth). If this module 130 is subsequently plugged in to a second (different) security core, that second security core would preferably stamp any pre-existing data in the camera as "unsecure" as the data traverses the second core (for example, on its way to the I/O bus of the second integrated device for purposes of storing captured images in persistent storage). (Alternatively, the second device may be adapted such that it will not accept any previously-created data.) Marking a data stream "unsecure" indicates the security core's inability to vouch for the authenticity and untampered state of I/O or application processor data.

See Specification, page 21, line 18 to page 22, line 11. In other words, the security core may

conclude that a security sensitive operation with a component is not authentic if that component is disconnected, and may treat data that is later received from the reconnected component as "unsecure". Nothing in Bjorn discloses or suggests the teachings recited in Amended Claim 1.

Accordingly, Applicants submit that Amended Independent Claims 1, 33 and 56 are patentable over the cited references for at least the reasons discussed above. Furthermore, the dependent Claims are patentable at least per the patentability of the independent base claims from which they depend.

### CONCLUSION

Applicants respectfully submit that pending claims are in condition for allowance, which is respectfully requested in due course. Favorable examination and allowance of the present application is respectfully requested. It is not believed that any extension of time is required for this paper. However, in the event that an extension of time is necessary to allow consideration of this paper, such an extension is hereby petitioned under 37 C.F.R. §1.136(a). Any additional fees believed to be due in connection with this paper may be charged to our Deposit Account No. 09-0461.

Respectfully submitted,



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